

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

NICOLE HARRIS,

Plaintiff,

-vs-

CITY OF CHICAGO, et al.,

Defendants.

Case No. 14 C 4391

Chicago, Illinois
March 30, 2016
9:30 o'clock a.m.

TRANSCRIPT OF PROCEEDINGS
BEFORE THE HONORABLE JOHN W. DARRAH

APPEARANCES:

For the Plaintiff:

VALOREM LAW GROUP LLC
BY: MR. STUART JAY CHANEN
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Chicago, Illinois 60601

For the Defendants:

GREENBERG TRAURIG
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1 (Proceedings had in open court:)

2 THE CLERK: 14 C 4391, Harris versus City of
3 Chicago.

4 MR. FLYNN: Good morning, your Honor. Kyle Flynn
5 on behalf of the City of Chicago.

6 THE COURT: Good morning, Counsel.

7 MR. CHANEN: Good morning, your Honor. Stuart
8 Chanen on behalf of the plaintiff, Nicole Harris.

9 THE COURT: Good morning, Mr. Chanen.

10 Defendant City has filed a motion to reconsider the
11 order denying the motion to stay. I have reconsidered it. I
12 read the propounded discovery, I read the response filed by
13 your people, Mr. Chanen, and the City's motion is denied.

14 In that motion you also raise some questions
15 regarding the breadth of the propounded discovery. I'm going
16 to direct you to meet and confer regarding the materials
17 sought in good faith and see if you can't narrow that.

18 We're going to meet those dates. Those dates are
19 going to remain in effect and the clock is ticking, so it's
20 in your interest to try to come to some accord here. From a
21 disinterested third party's point of view, there's an awful
22 lot of effort going into things that I'm not sure are going
23 to bear much fruit in these discovery wars.

24 There's also defendants' motion to strike your
25 declaration, Mr. Chanen. That's denied. But I will read

1 your motion against the declaration and determine what weight
2 to give the declaration in light of the objections you raise
3 in your motion.

4 MR. FLYNN: Thank you, your Honor.

5 MR. CHANEN: Judge, on that point, yesterday I sent
6 --

7 THE COURT: So far you're winning on that, Mr.
8 Chanen.

9 MR. CHANEN: I know. May I -- yeah. All right,
10 Judge.

11 THE COURT: No, go ahead. Say what you want to
12 say.

13 MR. CHANEN: I had sent Ms. Fordyce -- she had
14 e-mailed me asking me about the declaration, and I had
15 e-mailed her back explaining why we did not feel that there
16 was a misrepresentation that she was alleging. Should we
17 submit to the Court just that --

18 THE COURT: If you want to file that in the way of
19 a -- kind of a reply, I'll read all of that together to
20 determine what weight to give the declaration.

21 MR. CHANEN: Thank you, your Honor.

22 THE COURT: Okay. But let me encourage you really
23 to see if you can't resolve these discovery issues.

24 MR. CHANEN: Thank you, Judge.

25 MR. FLYNN: Thank you, your Honor.

1 THE COURT: You're welcome.

2 (Which were all the proceedings heard.)

3 CERTIFICATE

4 I certify that the foregoing is a correct transcript
5 from the record of proceedings in the above-entitled matter.

6
7 */s/ Mary M. Hacker*

April 6, 2016

8
9 _____
Mary M. Hacker
Official Court Reporter

Date